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March 31, 2020

VIA ECF

The Hon. Sarah Netburn
United States Magistrate Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *Rich v. Fox News Network LLC, et al.*, No. 18-cv-2223

Dear Judge Netburn:

Plaintiffs Joel and Mary Rich and Defendant Fox News Network, LLC (the “Parties”) jointly submit this letter regarding ESI protocol, pursuant to the Court’s March 11 Order. See Docket No. 127. The Parties are nearing agreement on the outstanding issues regarding search terms and custodians and do not expect at this time to have a disputed issue for the Court regarding terms or custodians. Because the Parties continue to refine a handful of search strings, we respectfully request permission to file a list of agreed-upon search terms by next Tuesday, April 7.

For document requests for which the Parties have agreed to run search terms “through the present,” we have agreed that the cutoff will be April 1, 2020.

The Parties reserve the right to request additional custodians or terms or to expand the requested timeframes if developments in the litigation or facts learned during discovery warrant it.

Sincerely,

/s/ Beatrice Franklin

Beatrice Franklin